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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:)

DISMISSAL OF ALL PENDING)
PIONEER'S PREFERENCE)
REQUESTS)

CC Docket No. 92-297

ET Docket No. 94-124

GEN Docket No. 90-314

GEN Docket No. 90-357

IB Docket No. 97-75 98

REVIEW OF THE PIONEER'S)
PREFERENCE RULES)

ET Docket No. 93-266

To: The Commission

COMMENTS IN SUPPORT OF
PETITION FOR RECONSIDERATION
OF QUALCOMM INCORPORATED

Global Broadcasting Company, Inc. ("Global"), by its attorneys, herewith supports the "Petition for Reconsideration of Qualcomm Incorporated" ("Petition"). In support, the following is shown.

1. On June 24, 1996, Gregory D. Deieso, tendered a "Petition for Rulemaking" requesting that the FCC initiate a rulemaking proceeding to establish Event Broadcast Stations, a service which Mr. Deieso had pioneered.¹ On July 15, 1996, Mr.

¹ The Petition was initially filed in the name of Web SportsNet, Inc. However, it was supplemented and revised on September 27, 1996, to reflect that the Petitioner is Gregory D. Deieso.

Deieso tendered a "Request for Pioneer's Preference" for his work in creating Event Broadcasting.

2. Mr. Deieso has assigned all of his interests in this matter to Global, in which he is a principal and a 50% shareholder. Thus, Global is the successor to Mr. Deieso with regard to the request for a Pioneer's Preference.

3. Global enthusiastically supports, the Qualcomm Incorporated Petition. Qualcomm has persuasively demonstrated why the Commission's action dismissing all pending requests for Pioneer's Preferences, including that of Mr. Deieso, was not justified.

4. Accordingly, Global joins with Qualcomm in requesting that the Commission reverse its action. Moreover, Global requests that the Commission consider on the merits that Mr. Deieso's July 15, 1996, "Request for Pioneer's Preference" as supplemented September 27, 1996.

Respectfully Submitted,

GLOBAL BROADCASTING COMPANY, INC.

By Harold K. McCombs, Jr.
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Its Attorney

November 12, 1997

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CERTIFICATE OF SERVICE

I, Harold K. McCombs, do hereby certify that I have caused to be served by mail, First Class postage prepaid, this 12th day of November, 1997, copies of the foregoing "Comments in Support of Petition for Reconsideration of Qualcomm Incorporated" upon the following persons:

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